

numoh@umohlaw.com <numoh@umohlaw.com>

Tue, Jul 1, 2008 at 8:13 PM

To: Deborah MartinNorcross <dmnorcross@martinnorcross.com>

Cc: "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>, chidieze@yahoo.com

Attached are the rest of plaintiff's emails.

In regards to Mr. Eze's earlier email that stated he could not produce documents that did not exist, Mr. Eze was unaware that plaintiff had emailed me those documents twelve minute prior to his email to the defendants. I was likewise unaware of the emails until later in the day.

These emails were not sent with the first set because of some emergencies that I had to attend to.

Uwem I. Umoh
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----- Original Message -----

Subject: Mann v. Plus One, etc.
From: "Deborah MartinNorcross" <dmnorcross@martinnorcross.com>
Date: Fri, June 27, 2008 10:58 am
To: chidieze@yahoo.com
Cc: "numoh@umohlaw.com" <numoh@umohlaw.com>, "Harold Derschowitz (x263)" <HDERSCHOWITZ@lskdnylaw.com>

Dear Mr. Eze:

In our May 9, 2008 "deficiency letter," we specifically requested, among other things, all e-mails corresponding to the "sent" lists reflected in Doc. Nos. JM0208 - JM0224, as well as any communications received by Plaintiff from potential employers. See Note 4 regarding Request No. 22 on Page 6. When Mr. Umoh responded on May 16, he provided no supplementation to that Request.

We specifically discussed this Request in our June 11 conference. In Plaintiff's June 16 supplementation, we were provided with copies of 13 e-mails. I notified you that, based on the e-mail sent lists, your responses remained deficient. At 2:15 p.m. on June 20, you wrote: "We provided you with all we have. We cannot manufacture documents. If you did not get it, we do not have it."

This statement was obviously untrue. At 2:03 p.m. on June 20, twelve minutes before you e-mailed me, your client forwarded additional mitigation documents to Mr. Umoh at info@umohlaw.com. A total of 123 pages were printed on Sunday, June 22 between 5:30 p.m. and 8:22 p.m., and on Wednesday, June 25 between 3:55 p.m. and 4:14 p.m. They were not provided to us until 8:24 p.m. last night.

Preliminarily, the production remains incomplete. There are approximately 400 entries on the sent list. Even assuming we can match what we received last evening with the list, an undertaking we obviously have not yet had time to complete, that production covers only a fraction of the list. Moreover, you have not provided us with any responses Plaintiff received, or anything relating to Plaintiff's current employment or any other employment she has had since June 2006. You cannot credibly claim Plaintiff does not have these documents. As but one example, Plaintiff herself invoked her "contract" in her affidavit, yet even that document has not been produced.

That brings me to the most troubling aspect of this. Despite the multiple opportunities we have given Plaintiff to correct and supplement her discovery responses, we simply have not been told the truth - not about Plaintiff's employment status, not about her deposition, and not about the existence of documents. I am sure you understand how serious a problem this is. Even if Plaintiff now provides the complete supplementation to which all defendants are entitled, as we again request that she do, we have no alternative but to bring this situation to the attention of the Court and to request significant sanctions.